

**To:** Dinkins, Carol[cdinkins@velaw.com]  
**Cc:** Hick, Patricia[Hick.Patricia@epa.gov]  
**From:** Flanagan, Sarah  
**Sent:** Thur 5/15/2014 9:54:06 PM  
**Subject:** Diamond Alkali -LPRSA Questions

Carol,

Following up on our discussion on Monday, May 12, 2014, EPA agrees that it is not feasible for Tierra Solutions, Inc. (Tierra) to begin work at RM 10.9 in the first week of June, as this does not allow EPA sufficient time to review the QAPP (received on May 9), and there is also some question about whether the CPG's work will be complete. Paul Brzozowski advised Jennifer LaPoma that Tierra proposes to undertake the survey work in the first two weeks of August. If it is possible to improve this schedule, EPA would prefer that. Failing that, the work should proceed beginning August 4 as proposed by Tierra.

You also asked whether University of Illinois (UoI) needs to demonstrate a quality system that meets the requirement in Paragraph 17 of the Unilateral Administrative Order by submitting a Quality Management Plan (QMP), or if this requirement could be waived. This highlights a concern of EPA's. I understand that Tierra had to revise the draft QAPP substantially, because the UoI is not familiar with the QAPP requirements. You also mentioned that Tierra is planning to hire a contractor to operate the survey equipment, under the direction of the UoI. Given the fact that UoI does not appear to be accustomed to meeting EPA requirements, we are not inclined to waive the QMP and we do have some concerns about UoI's technical qualifications. Jennifer LaPoma will be following up with Paul Brzozowski on this, as well as on concerns raised by review of the QAPP.

You also asked about the cap that the CPG is installing at RM 10.9. I did not recall this at the time we spoke, but the cap does include an activated carbon layer, mixed with sand to chemically isolate the contaminated sediments from the environment. Overlying the sand/active layer is a geotextile layer and then an armor stone layer, which act in part, as bioturbation barrier.

The data collected by Lockheed Martin from the river in the vicinity of RM 10.9 came in this week and Alice Yeh forwarded the report, which includes the TCDT, to your colleague Deborah Raichelson.

Finally, you inquired about review of the administrative record file supporting the recently released Proposed Plan. The documents assembled as of April 11, 2014, are in electronic form and I could send them to you on a DVD. If you do want to send someone to review the files, you could certainly do that. The Records Center here at 290 Broadway prefers to get a call in advance, to make sure they can accommodate reviewers. They can be reached at 212-637-4308. Of course, additional material will be placed in the file as we receive comments and other submissions, and EPA may add to the file as we review and respond to comments.

Regards,

-Sarah

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